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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Parts 2, 22, 90)
and 94 of the Commission's Rules) RM-8200
and Regulations to Permit Routine)
Licensing and Use of)
Bi-Directional Signal Boosters)

To: The Commission

STATEMENT IN SUPPORT
OF
CELWAVE, A DIVISION OF RADIO FREQUENCY SYSTEMS, INC.

Celwave, a division of Radio Frequency Systems, Inc. ("Celwave"), by counsel and pursuant to Section 1.405 of the Commission's rules and regulations, 47 C.F.R. § 1.405, respectfully submits this statement in support of the Petition for Rule Making filed by TX RX Systems, Inc. ("TX RX") on February 25, 1993 (the "Petition").¹

I. PRELIMINARY STATEMENT

Celwave designs and manufactures antenna systems and components for world-wide land mobile applications. Celwave is headquartered in Marlboro, New Jersey. For over sixty years the company has been a supplier of communications equipment and sells its communications equipment to radio manufacturers, wireless system operators and distributors worldwide. Celwave's present product line includes signal boosters, amplifiers, dividers, base station and mobile antennas, transmission line, mobile and base

¹ The Petition was placed on public notice for comments by Public Notice (Report No. 1933) dated March 18, 1993.

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station filters, multi-couplers and combiners.

Celwave is the leading manufacturer of signal boosters and currently holds type acceptance authorizations from the Commission for various unidirectional and bi-directional units. Therefore, Celwave will be directly affected by the Commission's decision in

~~this matter and urges the Commission to grant the Petition~~

consuming and burdensome procedure), most private radio licensees (operating systems authorized under Parts 90 and 94 of the Commission's rules) are unable to operate signal boosters as a part of their systems.² In the common carrier services, only cellular licensees in the Domestic Public Cellular Radio Service are permitted to operate "cell boosters" to improve the coverage of a cellular system.

III. STATEMENT IN SUPPORT

Celwave is in full support of the TX RX Petition. Celwave concurs that the Commission must recognize the role of the signal booster and the benefit to the public in permitting the operation of signal boosters in the private land mobile and microwave radio services, including two-way mobile systems, paging systems, and multiple address systems, and in the common carrier mobile radio services, including paging. In recent years, there has been an ever-increasing emphasis and demand for mobile communications, as exemplified by the Commission's initiation of a rule making to allocate spectrum for the Personal Communications Services. Most users consider mobile communications, such as pagers, mobile radios, and cellular telephones, to be a necessity rather than a luxury. Radio system operators with "holes" in their coverage areas find it difficult to compete in the marketplace because of the user's requirement for "perfect" service.

² There are a limited number of frequencies in the 460/465 MHz bands on which signal boosters may be operated but such use is restricted to licensing by Business Service Radio eligibles and available only for operation in conjunction with aircraft operations at major commercial airports.

Further, many two-way mobile systems are vital to protection of the public safety and welfare. such as fire. police and rescue

Further, the "Class A" boosters, as defined in the TX RX Petition, operate in such a manner that it is highly unlikely that interference would be created by the use of these boosters. With "Class B" boosters, interference may be possible but generally those boosters are used in areas where the possibility of

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paging service regulated under Part 22.

IV. CONCLUSION

Celwave supports the TX RX Petition and encourages the Commission to immediately grant the Petition and initiate a rule making proceeding and adopt the proposed rule changes. Signal boosters will be an essential part of providing quality telecommunications that have become instrumental in the conduct of day-to-day business activities. Vital public safety functions depend on the ability of local governments to have the option of employing signal boosters in the design and construction of new systems. For the reason set forth above, Celwave fully supports the TX RX Petition.

928/952 MHz and 932/941 MHz" (at p. 19), but does not include the 150-170 MHz band, 450-470 MHz band or 470-512 MHz band in its request. However, the proposed rules in the Appendix to the Petition include these bands as ones in which signal boosters may be operated. Celwave urges the Commission to include all private land mobile radio service bands as set forth in the proposed amended rules rather than only the 800/900 MHz bands as apparently sought by TX RX.

WHEREFORE, Celwave, a division of Radio Frequency Systems, Inc., respectfully requests the Federal Communications Commission to grant the Petition for Rule Making filed by TX RX Systems, Inc., immediately adopt a Notice of Proposed Rule Making incorporating the rules proposed by TX RX Systems, Inc., and expeditiously take action in the rule making proceeding.

Respectfully submitted,

CELWAVE, a division of
RADIO FREQUENCY SYSTEMS, INC.

By: 
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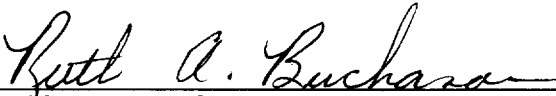
Date: April 19, 1993

CERTIFICATE OF SERVICE

I, Ruth A. Buchanan, a secretary with the law firm of Meyer, Faller, Weisman and Rosenberg, P.C., hereby certify that I mailed a copy of the foregoing Statement in Support (RM-8200) on the 19th day of April 1993 via First Class U.S. Mail, postage prepaid, to:

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